

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

IN RE:)	CASE NO: 15-46687-399
WARDELL D HAWKINS)	Chapter 13
)	
)	Trustee's Objection to Confirmation
)	Original Confirmation Hearing set for:
Debtor)	November 4, 2015 10:00 am

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

COMES NOW John V. LaBarge, Jr., Standing Chapter 13 Trustee, and for his objection to confirmation states as follows:

1. The plan does not provide sufficient funds to pay all creditors entitled to full payment, including fair market value of secured claims and priority debts. 11 U.S.C. §§ 1322(a)(2) & 1325(a)(5)(B)(ii)
2. The Trustee has not received a copy of the most recently filed Federal tax return.
3. The set monthly payments to be made by the Trustee exceed the plan payment.

WHEREFORE the Trustee prays the Court enter its order denying confirmation of the proposed plan.

Dated: October 29, 2015

OBJCONF--KLW

/s/ Kathy Wright

Kathy Wright MO31047

Attorney for Trustee

P.O. Box 430908

St. Louis, MO 63143

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trust33@ch13stl.com

The undersigned hereby certifies that he served the above notice on this day of October 29, 2015, either through the Court's ECF system or by ordinary mail, postage pre-paid, addressed to:

/s/ Kathy Wright

WARDELL D HAWKINS
14320 VENTERA BLVD #211
SHERMAN OAKS, CA 91423

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